

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Geraldine A. Ross	:	Chapter 13
	:	
	:	
Debtor	:	Case No.: 18-10252AMC

**REQUEST FOR ADMISSIONS PURSUANT TO RULE 36 OF THE FEDERAL
RULES OF CIVIL PROCEDURE**

Pursuant to Rule 7036 of the Federal Bankruptcy Rules and Rule 36 of the Federal Rules of Civil Procedure, Geraldine A. Ross requests that the Claimant, CACH, LLC its successors and assigns as assignee of Capital One, N.A.. answer each of the following Requests for Admissions, separately and under oath, within thirty (30) days from the date of service hereof. If the space provided after each is not sufficient for your answer, please use additional sheets. A true and correct copy of each document referenced is attached to these Requests for Admissions.

1. It is admitted that CACH, LLC its successors and assigns as assignee of Capital One, N.A., in the Chapter 13 Bankruptcy Case of Geraldine A. Ross, case number 18-10252 filed a Proof of Claim. Hereto attached is a copy of the claim.
2. It is admitted that you filed a claim against Debtor, Geraldine A. Ross.
3. It is admitted that the proof of claim asserts Geraldine A. Ross is the sole Debtor to the proof of claim.
4. It is admitted that the Debtor did not use or make payment on this debt within four (4) years from the filing date of 1/15/2018, of this instant Chapter 13 Bankruptcy.
5. It is admitted that you do not have a right to assert this claim and such claim exceeds the Pennsylvania Statue of Limitations.
6. It is admitted that the claims account number ends xxx4598.
7. It is admitted that this claim should be stricken from the claims register.

Dated: September 5, 2018

/s/Brad J. Sadek, Esq
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